

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF GEORGIA

In re:
Joseph L. Osheim

Debtor(s).

*
* Chapter 13
*
* Case No. 17-71051
*

**OBJECTION TO ARREARAGE PORTION OF AMENDED PROOF OF CLAIM
NUMBER 3, FILED BY RUSHMORE LOAN MANAGEMENT SERVICES, LLC**

COME(S) NOW the Debtor(s), by and through his/her/their attorney of record, and objects to the Arrearage Portion of Amended Proof of Claim Number 3 filed by Rushmore Loan Management Services, LLC and shows this court as follows:

1.

Rushmore Loan Management Services, LLC filed an Amended Proof of Claim on September 9, 2022.

2.

The Arrearage portion of the Amended Claim should be reduced to \$9,869.12.

WHEREFORE, DEBTOR(S) PRAY(S):

(a) That the arrearage portion of the Amended Proof of Claim 3 filed by Rushmore Loan Management Services, LLC be reduced to \$9,869.12.

(b) For such other and further relief as this court deems just and proper.

/s/ William Woodall

William Woodall

Attorney for Debtor(s)

1003 N. Patterson St.
P.O. Box 3335
Valdosta, GA 31604-3335
(229) 247-1211
Georgia Bar No. 775043

IN THE UNITED STATES BANKRUPTCY COURT
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* CHAPTER 13
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Debtor.

NOTICE

TO: RUSHMORE LOAN MANAGEMENT SERVICES, LLC

Joseph Osheim HAS FILED AN OBJECTION TO THE ARREARAGE PORTION OF
YOUR AMENDED PROOF OF CLAIM NUMBER 3 IN THIS BANKRUPTCY CASE:

Your claim may be reduced, modified, or eliminated. You should read these documents carefully with your attorney, if you have one in the bankruptcy case. **If you do not have an attorney, you may wish to consult one.** If not served with this notice in accordance with the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, a copy of the Objection may be obtained upon written request to counsel for the Movant (identified below) or at the Clerk's office.

If you do not want the court to eliminate or change your claim, then you or your attorney shall file with the court a written response to the objection on or before **February 27, 2023** plus an addition (3) three days if sent by mail. The objection or response should be sent to:

Clerk, U.S. Bankruptcy Court, Middle District of Georgia
P.O. Box 2147
Columbus, GA 31902-2147

**If a response is filed, a hearing on the objection to your claim shall be held on:
March 29, 2023 at 8:30 a.m.
in the U.S. Court House 401 N. Patterson St., Valdosta, GA 31601**

Parties should consult the Court's website (www.gamb.uscourts.gov) concerning whether the hearing will be in-person, telephonic, or virtual. Please refer to Administrative Order #145 for more guidance.

If you mail your response to the Court for filing, you shall send it early enough so the court will **receive** it on or before the response date stated above.

Any response shall also be served on the objecting party

If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim.

This notice is sent by the undersigned pursuant to LBR 9004.

/s/ William Woodall

William Woodall
Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I certify that I have, this 27th day of January, 2023 served a copy of the foregoing Notice and Objection to Arrearage Portion of Amended Proof of Claim 3 on Jonathan W. Deloach, Chapter 13 Trustee, P.O. Box 1907, Columbus, GA 31902-1907 via electronic notice and the following:

Rushmore Loan Management Services, LLC
P.O. Box 55004
Irvine, CA 92619

McMichael Taylor Gray, LLC
3550 Engineering Drive, Ste. 260
Peachtree Corners, GA 30092

by depositing the same in the U.S. Mail in a properly addressed envelope with first class postage affixed thereon to insure delivery.

/s/ William Woodall

William Woodall, Attorney for Debtor

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